

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
RICHARD J. JOHNSON, SR. : CASE NO. 5-15-02208
Debtor. :

M&T BANK :
Movant, :

vs. :
RICHARD J. JOHNSON, SR. :
Respondents. :

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, Richard J. Johnson, Sr., the Debtor, and files an Answer to People's
Security Bank & Trust's Motion for Relief From the Automatic Stay:

1. Richard J. Johnson, Sr. (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor's Counsel is in the process of contacting the Debtor to ascertain if said payments were made and/or if Debtor is in possession of the funds needed to cure the alleged default.
4. In the event there remains an arrears, the Debtor wishes to enter into a Stipulation to cure the arrears over a six (6) month period and/or place the arrears in an amended Chapter 13 Plan.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: December 13, 2016

/s/Tullio DeLuca
Tullio DeLuca, Esquire
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 13, 2016, he caused a true and correct
copy of Debtor's Answer to M&T Bank's Motion for Relief from the Automatic Stay to be served
Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

William Miller, Esq. at wmiller@sterneisenberg.com

Dated: December 13, 2016

/s/Tullio DeLuca
Tullio DeLuca, Esquire